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December 27, 2021

VIA ECF and Email

The Honorable Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007
Torres_NYSDChambers@nysd.uscourts.gov

Re: *Syracuse Mountains Corp. v. Bolivarian Republic of Venezuela*,
Case No. 1:21-cv-02678-AT

Dear Judge Torres:

On behalf of our client, plaintiff Syracuse Mountains Corporation in the above referenced case, we respectfully submit this status letter regarding service of process pursuant to your Honor's November 16, 2021 Memo Endorsement, Dkt. 27.

By way of background, we submitted to the Clerk of the Court the necessary documents for service upon defendant Bolivarian Republic of Venezuela in accordance with Section 1608(a)(4) of the Foreign Sovereign Immunities Act, which the Clerk then transmitted to the Department of State on May 21, 2021, as noted in our June 14, 2021 status letter to the Court, Dkt. 20, and the Clerk's Certificate of Mailing, Dkt. 19.

As explained in our August 13, 2021 Letter to the Court, Dkt. 22, we received the following update from the Department of State via email on August 10, 2021: "[T]he Department received the request, and it is being processed for service through diplomatic

channels, but at the moment it has not yet been transmitted. Once that occurs, a certified copy of the diplomatic note will be returned to the clerk.” Dkt. 22-2.

We have been in regular contact with the Department of State since that time. On November 29, 2021, the Department of State informed us that the administrative steps to transmit the materials for service had largely been completed, and that the Department of State was in the process of arranging physical delivery through diplomatic channels. However, as nearly seven months had passed since we had submitted the service materials, the requisite cashier’s check initially provided had expired. We have since arranged for a replacement cashier’s check to be delivered to the Department of State. On December 22, 2021, the Department of State informed us that they had received the replacement cashier’s check and were working “to finalize logistics for delivery” of the completed service documents. We have attached a copy of our correspondence with the Department of State to this filing.

We will continue to follow-up with the Department of State and promptly notify the Court when service of process is complete.


Respectfully,

/s/ Michael DeBernardis
Michael DeBernardis

GRANTED. Plaintiff shall submit a letter updating the Court on the status of service by the earlier of **January 27, 2022**, or notification that service has been completed.

SO ORDERED.

Dated: December 28, 2021
New York, New York



ANALISA TORRES
United States District Judge